

James E. Cecchi
CARELLA, BYRNE, CECCHI,
OLSTEIN, BRODY & AGNELLO
5 Becker Farm Road
Roseland, NJ 07068
(973) 994-1700

Hannah Ross
James A. Harrod
Jai K. Chandrasekhar
James M. Fee
BERNSTEIN LITOWITZ BERGER
& GROSSMANN LLP
1251 Avenue of the Americas
New York, NY 10020
(212) 554-1400

*Lead Counsel, Interim Class Counsel, and
Counsel for Plaintiffs AirConditioning and
Refrigeration Industry Health and Welfare
Trust Fund, Fire and Police Health Care
Fund, San Antonio, and Plumbers Local
Union No. 1 Welfare Fund*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IN RE VALEANT PHARMACEUTICALS
INTERNATIONAL, INC. THIRD-PARTY
PAYOR LITIGATION

Civil Action No. 3:16-cv-3087-MAS-LHG

District Judge Michael A. Shipp

Magistrate Judge Lois H. Goodman

Special Master Dennis M. Cavanaugh,
U.S.D.J. Ret.

**NOTICE OF PLAINTIFFS' MOTION FOR FINAL APPROVAL OF
SETTLEMENTS AND APPROVAL OF PLAN OF ALLOCATION**

To: All persons on ECF service list

PLEASE TAKE NOTICE that on December 2, 2021, at 10:00 a.m., either in Courtroom
1 of the United States District Court for the District of New Jersey, Clarkson S. Fisher Building &

U.S. Courthouse, 402 E. State St., Trenton, NJ 08608, or by telephone or videoconference (in the discretion of the Court), Plaintiffs Air Conditioning and Refrigeration Industry Health and Welfare Trust Fund, Fire and Police Health Care Fund, San Antonio, Plumbers Local Union No. 1 Welfare Fund, New York Hotel Trades Council & Hotel Association of New York City, Inc., and the Detectives Endowment Association of New York City (collectively, “Plaintiffs”), by and through their undersigned counsel, will and hereby do move the Court, before the Court-appointed Special Master, the Honorable Dennis M. Cavanaugh, for orders granting Plaintiffs’ Motion for Final Approval of Settlements and Approval of Plan of Allocation under Federal Rule of Civil Procedure 23 which will: (i) grant final approval of the two proposed settlements of the above-captioned class action on the terms set forth in the Stipulation and Agreement of Settlement with Valeant Pharmaceuticals International, Inc., dated August 4, 2021 (ECF No. 194-2) and the Stipulation and Agreement of Settlement with the Philidor Defendants, dated August 4, 2021 (ECF No. 195-2); and (ii) approve the proposed plan for allocating the net proceeds of the Settlement to the Settlement Class.

PLEASE TAKE FURTHER NOTICE that, in support of the Motion, the undersigned intend to rely on the accompanying Memorandum of Law and the accompanying Joint Declaration of James A. Harrod and James E. Cecchi and exhibits attached thereto, and the papers and pleadings filed in this Action, the arguments of counsel, and any other matters properly before the Court.

PLEASE TAKE FURTHER NOTICE that, proposed orders granting the relief requested herein will be submitted in connection with Plaintiffs’ reply submission, which will be filed no later than November 24, 2021, pursuant to the Court’s August 17, 2021 Orders Preliminarily Approving Settlement and Providing for Notice (ECF Nos. 196, 197).

Dated: October 28, 2021

**CARELLA, BYRNE, CECCHI,
OLSTEIN, BRODY & AGNELLO, P.C.**

/s/James E. Cecchi

James E. Cecchi
5 Becker Farm Road
Roseland, NJ 07068
Telephone: (973) 994-1700
Facsimile: (973) 994-1744
JCecchi@carellabyrne.com

***Lead Counsel, Interim Class Counsel, and
Local Counsel for Plaintiffs AirConditioning
and Refrigeration Industry Health and
Welfare Trust Fund, Fire and Police Health
Care Fund, San Antonio, and Plumbers
Local Union No. 1 Welfare Fund***

**BERNSTEIN LITOWITZ BERGER &
GROSSMANN LLP**

Hannah Ross
James A. Harrod
Jai K. Chandrasekhar
James M. Fee
1251 Avenue of the Americas
New York, NY 10020
Telephone: (212) 554-1400
Facsimile: (212) 554-1444

***Lead Counsel, Interim Class Counsel, and
Counsel for Plaintiffs AirConditioning and
Refrigeration Industry Health and Welfare
Trust Fund, Fire and Police Health Care
Fund, San Antonio, and Plumbers Local
Union No. 1 Welfare Fund***

BARRACK, RODOS & BACINE

Jeffrey W. Golan
Jeffrey A. Barrack
3300 Two Commerce Square
2001 Market Street
Philadelphia, PA 19103
Telephone: (215) 963-0600

*Counsel for Plaintiff the Detectives
Endowment Association of New York City*

**COHEN MILSTEIN SELLERS & TOLL
PLLC**

Julie Goldsmith Reiser
S. Douglas Bunch
1100 New York Ave, N.W.
East Tower, Suite 500
Washington, DC 20005
Telephone: (202) 408-4600

- and -

Christopher Lometti
Joel P. Laitman
88 Pine Street, 14th Floor
New York, New York 10005
Telephone: (212) 838-7797

*Counsel for Plaintiff New York Hotel Trades
Council & Hotel Association of New York
City, Inc. Health Benefits Fund*

#3061722

CERTIFICATION OF SERVICE

I hereby certify that on October 28, 2021, I caused a true and correct copy of the foregoing Notice of Plaintiffs' Motion for Final Approval of Settlements and Approval of Plan of Allocation to be electronically filed with the Clerk of the Court using the ECF system. Notice of this filing will be sent to counsel of record by operation of the Court's electronic filing system.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Dated: October 28, 2021

s/ James E. Cecchi

James E. Cecchi

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BRODY & AGNELLO, P.C.**

5 Becker Farm Road

Roseland, NJ 07068

Telephone: (973) 994-1700

Facsimile: (973) 994-1744

jcecchi@carellabyrne.com

*Lead Counsel for Plaintiffs and
the Settlement Class*